

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**  
(Northern Division)

NATIONAL FEDERATION  
OF THE BLIND, INC., *et al.*,

\*

\*

Plaintiffs,

\*

v.

Civil Action No. 19-2228-SAG

\*

LINDA H. LAMONE, *et al.*,

\*

Defendants.

\* \* \* \* \*

**JOINT MOTION TO EXTEND STAY OF PROCEEDINGS**

Plaintiffs and Defendants (collectively, “the Parties”), by and through their respective counsel, jointly move this Court for entry of an order extending the stay of these proceedings for an additional twenty-one (21) days beyond the current expiration of March 8, 2021 to March 29, 2021, and the Parties state the following in support thereof:

1. On November 12, 2020, the Court entered a stay of the proceedings in this case for 60 days to facilitate settlement discussions between the parties. ECF No. 77. On January 7, January 22, and February 12, 2021, the Court extended that stay by an additional 14, 21, and 21 days, respectively, for the same purpose. ECF Nos 79, 81, 83. Prior to the entry and subsequent extensions of the stay, the Parties had been engaged in discovery, but had recently resumed settlement negotiations and had sought the stay from this Court in order to devote their attention to these negotiations. ECF No. 76. The current stay is scheduled to expire on March 8, 2021.

2. Since the extension of the stay, the parties have continued their fruitful negotiations but have not been able to agree on a resolution of the case. Nevertheless, the Parties believe that an extension of the stay by an additional twenty-one (21) days, so that the Parties may continue these negotiations without the need to simultaneously devote resources to discovery, would aid in their efforts to reach a negotiated resolution.

3. Accordingly, the Parties wish to extend the current stay of these proceedings, including all currently pending discovery obligations, for a period of twenty-one (21) days past the March 8, 2021 expiration, to March 29, 2021, to allow for continued focused settlement discussions.

4. If the Parties are unsuccessful in reaching a negotiated settlement during this 21-day extension, they will notify the Court on or before the expiration of the extended stay with a joint motion to reinstate the litigation and a request for modification of the scheduling order deadlines. If the Parties appear to be making progress in their settlement negotiations, but believe that additional time would be helpful to fully resolve Plaintiffs' claims, they may also move the Court for an extension of the stay on or before the expiration of the extended stay.

Wherefore, for good cause shown, Plaintiffs and Defendants jointly move this Court for an extension of the current stay of the litigation for a period of twenty-one (21) days to March 29, 2021.

Dated: March 4, 2021

Respectfully submitted,

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/s/  
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\*Electronically signed, with permission,  
by Andrea W. Trento